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Market Served: Duluth/Superior

Call Letters: KDAL-AM/KDAL-FM/WDSM/WGEE/KRBR/KTCO

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Comments regarding MB Docket No. 04-233

Local News

- *Provide details on your stations investment in local news.* KDAL provides local newscasts twice an hour from 5am-10pm Monday through Friday as well as local newscasts on weekends. In our cluster-- that serves the Duluth/Superior market we operate a news department that caters to WDSM. In addition, our morning broadcaster assists the news department in news gathering. WDSM & WGEE are served regionally by the Minnesota News Network, Wisconsin Radio Network and the Associated Press. We provide local news updates 6 days per week. KTCO does two local news updates per hour, Monday-Friday 5am-9am and Saturday 6-8am. These local news updates are no less than ninety seconds in length. On KDAL-FM We provide local news updates 5 days per week. We do two local news updates per hour,

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Monday-Friday 5am-8am . These local news updates are no less than ninety seconds in length.

- *How many local newscasts are aired per week?* Approximately 175 on KDAL, 90 on WDSM & 57 on WGEE, 40 on KRBR, 30 on KDAL-FM and 44 on KTCO.
- *Do you allow on-air time for breaking news and local emergency information? Yes Give examples.* We have a local news department which goes out and covers breaking stories. We have covered everything from Presidential candidates in our city, fires, accidents on roads, information on roads that have been shut down because of accidents, bank robberies, actually the full compliment of anything and everything is covered. Taconite miners agree to labor deal, Northwest Airlines CEO Richard Anderson steps down, in addition to severe weather & traffic alerts. Amber Alert updates. We have put emergency information on the air in regards to auto accidents which may cause danger to motorists. We have also covered breaking local news such as when President Bush visited our city and we updated his travels for our listeners. On KDAL-FM We have put emergency information on the air in regards to auto accidents which may cause danger to motorists. We have also covered breaking local news such as when President Bush visited our city and we updated his travels for our listeners.
- *Give examples of how your website is used to enhance local news coverage.* Our website provides local people with an area to go to see local news and to find out what we our following, and that stories on the website are more in-depth because they have no time constrictions. We regularly post local news, both from our news department as well as from the Associated Press. In addition--we post statewide stories from both Minnesota and Wisconsin as well as national and international news.

Local Public Affairs

- *Describe all daily or weekly programs devoted to local public affairs, local politics, community activities, and similar issues including the length of such programs.* Kerry Rodd Show airs 9am-Noon M-F and is completely local. The show allows for local guests on any topic imaginable. Dave Walter Show is on air M-F from noon-2pm and is very news focused on what is going on in the local communities and Rhonda Grussendorf Show is on air from 2-3pm M-F and focuses on local entertainment type, and civic type issues. With these three shows which air 9am-3pm M-F we literally cover anything and everything going on in the area, from politics, community activities, local charities, etc. We also have our morning shows each day of the week from 5am-9am M-F, from 6am-9am on Saturdays and 6am-noon on Sundays

which are local programming that provide all the news, weather, sports and public information with no music!!!. Sunday mornings on WDSM, KRBR and WGEE we broadcast an in-house produced public affairs program entitled "Northland Rewind." This production is a collaborative effort between our news department and our morning broadcaster. Each week the program highlights the week's top LOCAL and STATE stories and utilizes non-partisan issue-orientated interviews from our station's talkshow hosts. Depending on the week's news--themes are utilized. Examples of themes used are the flu vaccine shortage or election coverage. The program runs thirty minutes. WDSM also airs local talk shows from 9am-11am and 5pm-6pm which take calls from the listeners and they can voice their opinions on local issues.

- *Are there regularly scheduled segments on local public affairs included in your local newscasts?* Yes. Those segments are built within our local shows on an everyday basis. *Give examples.* During Kerry Rodd Show we have segments that allow for people to call in with their thoughts on certain topics and how those topics effect the community. We open phone lines, we have local guests, it is just something we do on an every day basis. During the Dave Walter Show and during Rhonda's Show we carry nothing, but Public Affairs, Community Affairs based programming. Tougher smoking ban proposed--both sides weigh-in on possible impacts, Hermantown residents speak out on proposed Gander Mountain department store, regular updates on area city council meetings, community events and details on these events from organizers. On KTCO not only do we dedicate the vast majority of our newscasts to local events, we also have a feature called 'Mr. Roubiks Neighborhood'. This feature is no less than sixty-seconds in length and airs 10 times per week between 6am and 9am. 'Mr. Roubiks Neighborhood' covers local events from fund raisers to plays and choir concerts, and it's main focus is towards local family events. We also have this information available on our radio statoin website, www.ktco.fm

Creating or Selecting Programming

- *Describe your stations efforts and practices for determining the types of programming you air. For example, do you have an open door policy, accept and review e-mailed suggestions, conduct polls of your local audience, perform auditorium tests of various programming?* As mentioned before we open phone lines on topics on an every day basis. We have listeners call in with questions about what are the hot topics of the day and we open the lines and let people give their opinions. Most of what we air is listener driven. In other words our listeners call us on our voice mails, drop us e-mails and the like and then we determine what is the big issue based on

those communications. From that point we call guests, do our news interviews and then open the phone lines. Most of the polls we conduct are done right on the air. We do things called: KDAL Opinion Polls (KOP POLLS) where we just let our listeners talk. There is no need to do auditorium tests because we let the listeners tell us right on the air what they think of our programming. We literally ask them if they like what they hear and ask them to call in at that point in time! On WDSM Listeners, on a regular basis, make suggestions on our programming. We look at these with much scrutiny and consider how best we can program our stations for listeners. This input has come over the phone and through the mail as well as e-mail. In fact, listeners have been known to walk-in and talk with us directly about their ideas and concerns. In one such case we fielded comments on a local drive-time talk show that we were considering adding to our lineup. At KTCO we have an open door policy for persons to state their opinions. We also review e-mail and phone suggestions and we just completed a music test done by local listeners to help determine which songs to play. Furthermore, we always have a poll running on our website so we can keep the pulse of what our local audience is thinking on a wide-variety of issues.

- *Preemptions: Provide any examples when your station preempted network programming in order to air other programming of more interest to your local community, such as local political debates or local sporting events.* Because we are almost all local radio we don't have as much network stuff to pre-empt, but we pre-empt anything when we feel it is a noteworthy event. We broke into local programming when the plane of Senator Paul Wellstone crashed a year ago. We air local debates on a regular basis through our daily local talk shows. We air local marathon races live like: Grandma's Marathon, the North Shore In-Line Marathon and on Friday and Saturday nights we pre-empt programming to air our local college hockey games. We also are the station people turn to for local storm coverage. When storms hit we drop all our local programming and do nothing, but local coverage of the snowstorm, tornado, etc. During winter months we go into White Alert coverage when snowstorms hit in order to provide information to the communities we serve and to make sure we keep people safe. WDSM has been broadcasting LOCAL sports, both high school and college, for over 40 years. In addition, WGEE has added high school sports this year. In these cases programming preemptions are necessary, whether its network talk shows or local talk shows. Also, WDSM has carried LIVE and UNITERUPTED coverage of dignitary visits to Duluth. Recently, the vice president held a town-hall style meeting that WDSM carried in place of network programming. Prior to that-- WDSM carried the First Lady's visit to Duluth and network

programming was preempted. On KTCO when President Bush visited, we preempted normal programming to cover his arrival. Also, a sister station had a conflict and we preempted our normal programming to air Minnesota Twins playoff baseball so our local community could have an outlet to hear the game in our market.

Emergency Programming

- *Describe any live and/or on-the-scene coverage of emergencies, weather, traffic, crime and similar events, including any positive impact of your coverage on the local community.* As mentioned previously we do so much of this it is just second nature for us. We cover any type of local emergency with our local news staff. We've covered everything from plane crashes locally, bank robberies, snowstorms, tornados, drowning, and road closures, traffic. We even have a deal set up with our local bus service to have them call us when buses are running late. We send reporters to the scene when possible, we also rely on eyewitness accounts (after verification). On a routine basis our area experiences severe weather events, ranging from thunderstorms to blizzards--and everything in between. In these events we broadcast pertinent information to our listeners, whether its storm tracks or closures. Our area law enforcement agencies routinely contact us to 'spread the word' on crimes or traffic accidents. We take these events seriously as it effects our listeners. Just today fog had settled into the area ahead of an incoming weather system. Our morning broadcaster worked with the national weather service to spread safety tips to commuters. On KTCO When there was a fire in our community, one of our morning show personalities took the station vehicle and covered the event. We have been lucky to have minimal emergencies in our market, but will always have room to cover such events.
- *Describe your stations weather forecasting service.* We carry a private weather service, Weather Eye, and we also carry the National Weather Service. We have a computer tied into the latest information showing tracks of storms and such. Our private service gives us up to the second local coverage of storms, etc and the National Weather Service has local break-in capability where they can break into our programming when something big is happening. WDSM & WGEE carry forecasts from WeatherEye Inc. In addition, both WDSM & WGEE have immediate access to the National Weather Service. KRBR runs weather forecasts every hour.
- *Do your stations participate in AMBER or EAS? yes*

Political Programming

- *Describe all candidate debates sponsored or aired.* It would take me hours to do this because we have candidate forums all the time. Again, this is a bit redundant; we have the local candidates on the air on our local talk shows on a regular basis. We allow each candidate one our and ask them questions, plus we allow our listeners to ask them questions. Our LOCAL talk show hosts, Brad Bennett and Lew Latto, have hosted candidates for office and have offered listeners forums in which questions can be answered and concerns can be broadcast.
- *Do your stations offer candidates other types of free airtime? Give examples, and include examples of candidates declining offers of free airtime.* We offer the opportunity for anyone to contact us and be interviewed on our shows! We seldom have anyone decline offers because they know the value of our local programming. Yes, within the past week one of our talk show hosts offered an open forum to state house members. They did not respond.
- *Are local political issues discussed, or candidates interviewed, during newscasts or public affairs programming on a regular basis?* EVERYDAY AND ALL THE TIME! In many cases on WDSM our talk show hosts discuss political issues that are near and dear to them. In these cases they've encouraged listeners to vote. In addition our news department has covered multiple events where organizations are looking to register new voters.
- *Do your stations cover local campaign and /or convention events?* Yes
- *Describe your stations participation in promoting voter registration drives.* We run PSA's which tell people the importance of getting out to vote and we do shows with our local County Clerks to remind people to get out and vote. Plus we air, what we call a liner, the last two months prior to an election reminding people to vote. On WDSM/WGEE we are running spots to encourage voting. On KRBR our announcers are encouraging people to get out and voice their opinion by voting. We currently have a short promo running 4 times per day encouraging our local listeners to vote on November 2nd
- *Give examples of how your websites are used to enhance political coverage.* Through our website we let people know about the guests we have coming up on our talk shows and we can ask more in-depth questions of our listeners that we can then use on the air. As stated above--we post local, state, national and international news to WDSM's website and encourage listeners to go there. Local news could be a house fire, snowstorm or political event--such as a local person announcing his or her candidacy for office. In addition we poll listeners on political issues.

Civic, Cultural and Other Community-Responsive Programming

- *Please list examples of programming targeted to raise funds for local charity organizations.* We broadcast live from the local Lions Club Pancake Day taking pledges for their organization. We took on-air pledges for a local family burned out because of a fire. We took on-air pledges for a young girl under going a transplant. We took on-air pledges for a boy having open heart surgery (Hunter Yablonski). We auctioned off a Tim Cortez art piece to raise money for a child (Zach Mandrinich) in need of a transplant. This is just this year! We do this on an every year basis. WDSM broadcasts community events via thirty-second units called "Northland Event News." Generally we tell listeners about a couple different events--such as fundraisers. In addition, our talk show hosts routinely talk with listeners about fundraising events and our public affairs program, "Northland Rewind", broadcasts interviews with charity organizations. In fact, this past summer, we aired an interview conducted by one of our cluster's talkshow hosts in which officials from "Veterans On the Lake" talked about their organization and what it offers for local veterans. Just recently another of our cluster talk show hosts talked with officials from the foster grandparent organization--which looks to provide area children with grandmas and grandpas. On KTCO We do a radiothon for Gillette Childrens Hospital, which has a clinic in our community. This year, the event was on the air from August 19 through August 21. We dedicated a total of 30 hours to the radiothon, which included interviewing local families whose children have special needs. We also spoke with the children themselves as part of the three-day event. We also have a coin drive planned for February, working with local schools to raise funds for local children with special needs. On KDAL-FM We promoted a local fundraiser for a child with a rare form of brain cancer in June. We did live announcements and had information on our station website.
- *Describe any coverage of local events, such as local sports, fairs, holiday events, local theater, and fire or police outreach events.* We carry Univesity of Minnesota Duluth mens and womens colleg hockey, we air interviews five times a month on five different local theater groups, we broadcast live at the Senior Expo, we broadcast live at Grandma's Marathon, the North Shore In-Line Marathon, we charity raise \$12-\$15,000 per year for our hole-in-one event giving the money to kids clubs in the area. During the holidays we help with Salvation Army Food Drive, their bell ringing campaign. We have had listeners donate turkeys to the CHUM food Shelter and to the Salvation Army. We have interviewed numerous members of the Fire Dept. in the area whenever they need funds for new equipment and we have the local

police dept on the air on a monthly basis to talk about events they are involved in. Our "Northland Event News" units cover such events. Right now we're broadcasting various theater acts underway at local colleges as well as halloween and craft fairs, that are coming up, at area churches and schools. In addition our news department covers events in advance by getting to organizers and "Northland Rewind" covers what happened at these events. On KTCO We cover and have hosted local events such as fairs and local rodeos. Furthermore, we don't just cover local holiday events, we create them too. We again will be doing our "12 Days Of Christmas" promotion where we volunteer our time for 12 consecutive days to raise items of need for people in our community. We donate two-hour live broadcasts from 12 different local businesses to collect everything from kids jackets to nonperishable food items.

- *Please list the number of Public Service Announcements aired per week.* Between local live reads and recorded psa/s we air probably 300 a week!!! 100 on WDSM & 200 on WGEE. On KTCO While this number changes from week to week, we average 10 Public Service Announcements per week, not including the aforementioned Sunday morning program and 'Mr. Roubiks Neighborhood'.
- *Please list examples of your Public Service outreach in the community.* Where do you start? We have done outreach programs for the CHUM Food Shelter, Damiano Shelter, the homeless, Salvation Army, Senior Citizens homes, Cerebral Palsey, Muscular Dystrophy Association, MS Society, Cancer Society, American Lung Association, etc. As stated WDSM broadcasts "Northland Event News" along with national public service announcements from organizations such as the American Diabetes Association, National Lung Association and the Salvation Army. On KTCO As stated above, we volunteer our air-time and our staff for the holidays and our '12 Days Of Christmas' event. Also, we read to children in local public schools at least twice per year, we have local students on-air on occasion, we work with public schools with our coin drive, etc. we read to children in local public schools at least twice per year. We announce local events and post those events on the website.
- *Please list your stations coverage of important issues affecting the local community, such as consumer rip-off's, smoking and other health hazards, safety, drinking and driving, domestic abuse and similar issues.* We covered in-depth the local anti-smoking ordinance that the city passed and then followed that up with more information. That issue also cropped up in other local communities and we followed that as well. We interview people from MADD three, or four times per year! We have members of the Small Business Ass'n. join us talking about scams, we have computer people in talking about computer rip-offs, we have people from our womens shelter come in and talk about domestic violence and we have local medical people in on a regular basis. Our

news department covers a myriad of issues and "Northland Rewind" highlights issues that arose in the past week. Plus our talk show hosts tackle issues such as smoking bans.

Music

- *Do your stations provide on-air opportunities for local artists, either periodically or on a regular basis?* As mentioned previously we have local entertainers on the air during our regular talk shows quite often, as much as 4-5 times per month. We have an art and antique show every Thursday for 2 hours when local artwork is featured. On KRBR When ever we do a battle of the bands we try to get as many of the band on that we can. Local artist Tim Cortez has been in numerous times talking about his colored pencil art which is nationally known. We have had local musical guests in, we have people from the St. Louis County Heritage and Arts Center on the air once every two weeks talking about what is on display. We've had the curator of the Tweed Gallery on the air talking about their exhibitions. etc. If presented with a good song from a local artist, we give it every consideration to be played on the air and we always involve local artists when we work with national shows. For example, we had a Brad Paisley, Gary Allan, and Sherrie' Austin concert and we made sure to give opportunities to local bands to open the concert and perform for our local audience.
- *What percentage of your music programming is generated locally?* 95%
- *Do your stations research the market to determine the type of music they want to hear locally?* This is done on the FMS *Give examples.* We have the Bear Lab up for our listeners to give us input on the music that's being played. Within the past 8 years, there have been two market studies done to determine what our local community wants in local radio. These reports have helped us superserve our local audience to the best of our ability.

Station Participation in Community Activities

- *Give examples of your stations support and involvement with non-profit and charity initiatives.* Lions Club Pancake Day we help raise money, Salvation Army we help with bell-ringing and we solicit donations on air to give to them, we get donations of food for the local food shelves, we get eye glasses donated for the Lions Club, we have had hearing aids donated for charity, we have pushed hard the blood drives for those local

events, we've helped to raise thousands of dollars for local people who have been injured, displaced because of fire and in need of transplants. Our talk show host Lew Latto has been known to use country songs produced by a local artist as bumper music. Brad Bennett, our other talk show host, has been known to highlight local bands of the past during his program. In our community, KTCO is the official station for The March Of Dimes, for which we've won an award from that organization. We promote 'Walk America' and volunteer our time the morning of the walk to MC the event. Also, we have a great relationship with Childrens Miracle Network/ Gillettes Childrens Hospital and we will continue to do our yearly radiothon to help children with special needs in our community. On KDAL-FM we are the official station for The MS Walk. We promote 'Walk America', the MDA telethon, American Cancer Relay for Life and several other non-profit initiatives.

- *Provide examples of how your stations promote causes not tied to a particular organization, such as health screenings, free vaccinations, nutritional advice, community fundraisers, blood drives, disaster relief efforts, etc.* At the recent Senior Expo we had people screened for blood pressure and cholesterol. We have done interviews with local health professionals to explain where to get the flu vaccine because there has been confusion due to the shortage, we interview Betty Lou from Betty Lou's Health Store on a monthly basis about nutrition and vitamins, we interview the folks for blood drives monthly, we have raise thousands for people who have suffered disasters. We've used our "Northland Event News" units to spread the word on causes such as those mentioned and recently our news department produced a news package detailing the Douglas County Health Department's scheduling flu vaccines. We work with the A.L.S. association. The beginning of the year we have a New Years party we call "The Snowball" We sell sponsorships to it and sell raffle tickets and all the money goes to A.L.S. Also we were apart of their fishing tournament and dance. This summer was our first Bear girl car wash to raise money for A.L.S. We have an open door policy in this regard and we openly welcome such causes. We have a sweeper which runs an average of 16 times per week which encourages our listeners to let us know if they have a community event, fundraiser, or even a birthday that they would like us to promote on the air. We have promoted everything from local fundraisers to lost pets and we will continue to have an open door policy for our local friends.